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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

 Plaintiff,

 v.

FATHI ABDULRAHIM HARARA and
 NATIVE GROUNDS, LLC, d/b/a
 JERUSALEM COFFEE HOUSE,

 Defendants.

CASE NO. 3:25-CV-04849-SI

 RELATED CASE

 CASE NO. 3:25-CV-02060-SI

**JOINT STIPULATION AND
 [PROPOSED] AMENDMENT TO CASE
 MANAGEMENT ORDER**

The parties in these related cases stipulate to and hereby request an amendment of the current discovery deadlines. The parties continue to engage in discovery and are currently discussing disputes over Defendants’ document production and written discovery responses. The parties are attempting to resolve these discovery disputes before seeking the Court’s involvement, and the additional time needed for Defendants’ productions and subsequent discussions on deficiencies have caused delays in the discovery calendar.

Because of these delays, the parties stipulate to and propose an extension to the current discovery deadlines and to allow full discovery to take place in this case. This extension would be the first

extension of the close of discovery and the second extension of the expert disclosure and rebuttal disclosure deadlines, which the Court previously extended by approximately one month as a result of the federal government shutdown. *United States v. Harara et al.*, Case No. 3:25-cv-04849, *Dkt. 42*; *Radice v. Jerusalem Boxing Club, LLC et al.*, Case No. 3:25-cv-02060, *Dkt. 59*.

Counsel for Plaintiff United States and counsel for Plaintiff Michael Radice in the related case conferred with Defendants' counsel, and the parties have stipulated to the following proposed schedule:

Event	Current Date	Proposed Date
Expert Disclosures	January 15, 2026	February 27, 2026
Expert Rebuttal Disclosures	February 16, 2026	March 31, 2026
Close of Discovery	February 28, 2026	April 30, 2026

The parties are prepared to discuss corresponding changes to the remaining deadlines in the scheduling order at the Case Management Conference scheduled for February 06, 2026, should the Court grant the [Proposed] Amendment to the Case Management Order.

This joint stipulation to amend the case management order is not made for the purpose of harassment, undue delay, or any other improper purpose.

Dated: January 13, 2026

/s/ Mazen Basrawi
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Counsel for Plaintiff United States of America

/s/ Glenn Katon
 GLENN KATON (SBN 281841)
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